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9 Attorneys for Plaintiff United States of America

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 UNITED STATES OF AMERICA,
14

15 *Plaintiff,*

16 v.
17

18 BAZAARVOICE, INC.
19

20 *Defendant.*

Case No. 13-cv-00133 WHO

**DECLARATION IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

1 I, Michael D. Bonanno, declare as follows:

2 1. I am an employee of the United States Department of Justice, Antitrust Division,
3 and counsel for the United States in this action. I have personal knowledge of the facts set forth
4 herein, and, if called as a witness, could and would testify competently thereto.

5 2. Exhibit B to Plaintiff's Motion for Entry of Final Judgment is Bazaarvoice's
6 Response to Items II.K and II.L in the Court's Order Regarding Remedy Phase ("Remedy
7 Order"), ECF No. 248. At the time of production, Bazaarvoice designated its entire response
8 "Confidential" under the Protective Order in this action, ECF No. 35. Additionally, portions of
9 Plaintiff's Memorandum in Support of its Motion for Entry of Final Judgment contain
10 information from Bazaarvoice's response to Items II.K and II.L that Bazaarvoice has designated
11 as "Confidential." The relevant portions of the Memorandum have been highlighted in the
12 unredacted version of the Memorandum that has been lodged with the Court.

13 3. Exhibit D to Plaintiff's Motion for Entry of Final Judgment is Bazaarvoice's
14 Response to Items II.A and II.B in the Court's Remedy Order, ECF No. 248. At the time of
15 production, Bazaarvoice designated its entire response "Confidential" under the Protective Order
16 in this action, ECF No. 35. Additionally, portions of Plaintiff's Memorandum in Support of its
17 Motion for Entry of Final Judgment contain information from Bazaarvoice's response to Items
18 II.A and II.B that Bazaarvoice has designated as "Confidential." The relevant portions of the
19 Memorandum have been highlighted in the unredacted version of the Memorandum that has
20 been lodged with the Court.

21 4. Appendix A to Plaintiff's Proposed Final Judgment is a copy of the Bazaarvoice-
22 PowerReviews Merger Agreement. When Bazaarvoice produced this document during
23 discovery in this litigation, it was designated "Highly Confidential" under the Protective Order in
24 this action, ECF No. 35.

25 I declare under penalty of perjury that the foregoing is true and correct. Executed in
26 Washington, DC on February 12, 2014.

27
28 By: 

Michael D. Bonanno